

I applaud the efforts and the spirit of compromise among the ARRL directors in their restructuring proposal. However, RM-10867 goes too far in some areas and doesn't go far enough in other areas.

RM-10867 doesn't go far enough in eliminating the Morse Code testing requirement. The FCC's main argument for retaining a 5 wpm Morse Code testing requirement in the 2000 restructuring is no longer valid. The ITU has allowed all nations to fully eliminate their Morse Code testing requirements for operating privileges on the HF amateur radio bands. Many nations have already done so, with no ill effects. I see no reason to retain a Morse Code testing requirement for the Amateur Extra license. All the philosophical arguments against the Morse Code testing requirement for the General license also apply for the Amateur Extra license. The Morse Code testing requirement gives Morse Code unilateral authority in the licensing process. It is a stand-alone test while important topics like Part 97 rules, emergency operations, and RF safety are just sections of the written exams. Although the 5 wpm Morse Code testing requirement is not an undue burden, it looks intimidating to people new to amateur radio, gives amateur radio a negative public image, and is not relevant to being a proficient and knowledgeable operator. Just because Morse Code has merits does not mean there should be a unilateral, stand-alone requirement. SKYWARN has merits, but there are no SKYWARN requirements in the amateur radio licensing system. Although SKYWARN was what drew me into amateur radio, I do not advocate a SKYWARN requirement.

In addition to the philosophical arguments for fully eliminating the Morse Code testing requirement, there is also a pragmatic argument. Under the current system, the FCC does not distinguish between Technicians who passed the 5 wpm exam from those who do not, and this has been a point of confusion. Some have the same license privileges as Technician Plus operators while others are restricted to the VHF and higher bands. Keeping the 5 wpm exam requirement for the Amateur Extra license will prolong the confusion and the added difficulty of enforcing the rules, as some Generals would be required to take the 5 wpm exam to upgrade while others would not be. It would be easier for everyone if the FCC eliminates the 5 wpm exam requirement for ALL license classes, including Amateur Extra.

On the other hand, RM-10867 goes too far in other areas. RM-10867 proposes free upgrades from the Technician class to the General class. I understand the reasoning behind this. The idea is to merge 6 license classes into 3 without downgrading privileges. Free upgrades are inevitable in such a restructuring proposal. However, I disagree with the ARRL's position that the Technician class should be upgraded to General. Free upgrades from the Advanced class to the Amateur Extra class are reasonable given that most of the current Amateur Extra exam question pool was part of the Advanced exam question pool before the restructuring in the year 2000. However, this argument does not apply for current Technician licensees. The material tested on the General exam is relevant to operating on the HF bands, the content of the current Technician exam was never intended to be sufficient for General class operating privileges, and the General license was never intended to be an entry-level license.

I disagree with the ARRL's opinion that the Technician license privileges have serious deficiencies that can only be resolved by upgrading Technicians to the General class. Simply eliminating the 5 wpm exam requirement would give all Technicians the same HF operating privileges as Technician Plus licensees and make it easier for them to upgrade to the General class. I realize that Technician Plus privileges on the HF bands are limited, but the idea is to provide a taste of HF operations and encourage licensees to upgrade. Expanding

Technician Plus privileges on the HF bands would be a MUCH more sensible change than free upgrades to the General class. But I believe that most of the problems that the ARRL cites with the Technician class are ones that can only be addressed by the amateur radio community at large and cannot be addressed by the license system.

I disagree with the ARRL's statement that the Technician exam is too difficult and that closing the Novice license in 2000 was a mistake. The current Technician exam question pool is a merger of the old Novice and Technician exam pools that existed before the restructuring in 2000. During the years when both the Novice and No-Code Technician licenses were available as entry-level licenses, new licensees (including myself) overwhelmingly chose the No-Code Technician license over the Novice license. The ARRL justifies keeping the 5 wpm exam requirement for the Amateur Extra class in spite of the arguments against it by stating that it does not pose an undue burden. Yet most new licensees considered passing the Technician exam to be an easier task than passing a 5 wpm Morse Code exam. Furthermore, the written exams are all multiple-choice and the questions pools are public information. I believe that the current Technician class works well as an entry-level class and that the current Technician exam is of reasonable difficulty.

The new Novice class proposed by the ARRL downgrades the privileges of existing Novices (like lowering the power limit on 10m to only 50W when most transceivers are capable of 100W). I have no objection to modest upgrades, but loss of privileges should be avoided at all cost, even if other privileges are upgraded in the process. The "incentive licensing" fiasco alienated many amateur radio operators. I realize that most current Novices are inactive, but such a change may alienate those who consider becoming active again in amateur radio. Also, since most Novices are inactive, they may not know about the restructuring and think they are operating legally when they are not. While ignorance of the rules does not justify breaking them, the FCC should avoid making changes that would result in people breaking the rules without realizing it. Furthermore, the reasoning behind the proposed downgrades in Novice operating privileges is the alleged need to create an easier entry-level exam with no RF safety questions.

The proposed Novice class is not necessary. As I mentioned before, I do not believe the current Technician exam poses an undue burden. Furthermore, the lack of RF safety questions in the proposed new Novice exam is cited as the reason for stricter power limits for existing Novice licensees. If the FCC agrees with the ARRL that closing the Novice license was a mistake, then splitting the current Technician exam into separate Novice and Technician exams (the system in place before the restructuring of 2000) would be a better idea.

I disagree with the ARRL's proposed expansion of the HF phone/image bands for Amateur Extra operators on 40m and 80m. These modes use much more bandwidth than CW/digital modes. While I believe in eliminating the Morse Code testing requirement, the FCC should still reserve enough spectrum for narrowband modes and provide the incentive to use them. In the most crowded band conditions, offering more phone spectrum would be of marginal benefit to the SSB operators but a substantial detriment to the CW/digital operators.

I still believe that No-Code International's proposal, RM-10786, makes the most sense of all proposals made so far. The only change the FCC needs to make is the complete elimination of the Morse Code testing requirement. Although I have no objection to merging 6 license classes into 3, drafting a plan for this should NOT delay the elimination of the Morse Code testing requirement.

Changing the current band allocations also should NOT delay the elimination of the Morse Code testing requirement. If the FCC is undecided on how to merge the license classes or how to change the band allocations, then it should proceed immediately in eliminating the Morse Code testing requirement and defer the other changes to a later date.

If the need to merge 6 license classes into 3 is that urgent, it would be better to upgrade Technicians and Novices to Technician Plus privileges and eliminate the Novice license instead of the Technician license. If the Novice license needs to be reopened, then there should be at least 4 license classes. If Technician HF privileges are too limited, then it would be better to expand them rather than provide free upgrades to the General class.